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**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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INA STEINER, DAVID STEINER, and STEINER  
ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY, INC., PROGRESSIVE F.O.R.C.E.  
CONCEPTS, LLC, DEVIN WENIG, STEVE  
WYMER, WENDY JONES, STEVE KRYSTEK,  
JIM BAUGH, DAVID HARVILLE, BRIAN  
GILBERT, STEPHANIE POPP, STEPHANIE  
STOCKWELL, VERONICA ZEA, PHILIP COOKE,  
JOHN AND JANE DOE,

Defendants.

Civil Action No. 1:21-cv-11181-PBS

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**DEFENDANT WENDY JONES’S MOTION FOR LEAVE TO FILE 10-PAGE REPLY**

Defendant Wendy Jones respectfully requests leave to file a Reply to Plaintiffs’ Opposition to her Motion to Dismiss the First Amended Complaint (“FAC”), not to exceed 10 pages, on or before July 12, 2023.

As grounds for this motion, Ms. Jones states as follows:

1. Plaintiffs filed their FAC on March 1, 2023. ECF No. 176. The FAC runs over 122 pages and alleges eleven causes of action against Ms. Jones.
2. Ms. Jones filed a Motion to Dismiss the FAC and Memorandum in Support on April 21, 2023. ECF Nos. 205, 206.
3. Plaintiffs filed a Consolidated Opposition to the Motions to Dismiss the Amended Complaint filed by Ms. Jones and other defendants on June 12, 2023. ECF No. 221 (the “Opposition”).

4. The Opposition spans 94 pages and contains extensive discussion of the allegations against Ms. Jones. Ms. Jones is mentioned by name in the Opposition more than 120 times.
5. Ms. Jones hereby requests leave to file a Reply so that she may respond to the arguments in the Opposition that relate to her.

WHEREFORE, Ms. Jones respectfully requests that the Court grant leave to file a Reply brief, not to exceed 10 pages, on or before July 12, 2023.

Dated: June 15, 2023

Respectfully submitted,

/s/ Andrew J. O'Connor

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*Counsel for Wendy Jones*

**CERTIFICATION PURSUANT TO L.R. 7.1(a)(2)**

I, Andrew O'Connor, counsel for Wendy Jones, hereby certify that, in accordance with Local Rule 7.1(a)(2), counsel for Wendy Jones has conferred with counsel for Plaintiffs, who indicated that Plaintiffs take no position on this motion.

Dated: June 15, 2023

/s/ Andrew J. O'Connor  
Andrew J. O'Connor

**CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2023, I filed the foregoing Motion for Leave to File 10-Page Reply using the CM/ECF system, and caused it to be served on all registered participants via the notice of electronic filing (the “NEF”). I further certify that a copy will be served to all non-registered participants by First Class Mail.

Dated: June 15, 2023

/s/ Andrew J. O'Connor  
Andrew J. O'Connor